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Counsel for Plaintiff
BRUCE C. KYLES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRUCE C. KYLES,

CASE NO. C-13-4695-WHO

Plaintiff,

PLAINTIFF'S WITNESS LIST
[Jury Trial Demanded]

v.

CITY OF PITTSBURG, et al.,

Trial: January 26, 2015
Courtroom 12, 19th Floor
Honorable William H. Orrick IV

Defendants.

Plaintiff hereby sets for the witnesses he expects to call during his case-in-chief. These are not in order, with the parties through counsel agreeing to provide 24 hours' notice of witnesses expected order during trial.

Plaintiff Bruce C. Kyles. Events in question November 30, 2011, and related topics.

2.0-2.5 hours.

Defendant Juan Simental. Events in question November 30, 2011, and related topics.

1.0-1.5 hours.

Defendant Chunliam Saechao. Events in question November 30, 2011; related topics.

45 minutes-1.0 hour.

Defendant Gabriel Palma. Events in question November 30, 2011, and related topics.

45 minutes-1.0 hour.

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1 **Barry V. Brodd.** Plaintiff's retained police practices and use of force expert. The
 2 reasonableness of the force employed, training and topics, and alternatives available.

3 2.0 hours.

4 **Richard Polsky, PhD.** Plaintiff's retained canine behavior expert. Training of canines,
 5 breed suitability, dual purpose canines, causation, bite analysis. and related topics.

6 2.0 hours.

7 **Sgt. R. Semas.** By agreement, through notice. His review of the events and his report.
 8 30 minutes.

9 **Amarjit Dosanj, MD.** Dr. Dosanj performed surgery on Plaintiff's left leg injured in the
 10 event. Causation for the injuries, that the treatment received was both reasonable and
 11 necessary, the need for surgery, costs associated with the various procedures, future problems,
 12 pain and suffering of the plaintiff as observed, and related issues.

13 2.0 hours.

14 **Lisa Marie Quinones, MD.** Dr. Quinones attended surgery on Plaintiff's left leg injured
 15 in the event. Causation for the injuries, that the treatment received was both reasonable and
 16 necessary, the need for surgery, costs associated with the various procedures, future problems,
 17 pain and suffering of the plaintiff as observed, and related issues.

18 1.0 hours.

19 **Jennifer Stanger, MD.** Dr. Stanger attended surgery on Plaintiff's subject left leg.
 20 Causation for the injuries, that the treatment received was both reasonable and necessary, the
 21 need for surgery, costs associated with the various procedures, future problems, pain and
 22 suffering of the plaintiff as observed, and related issues.

23 1.0 hours.

24 **Joseph Carey, MD.** Dr. Carey attended a subsequent procedure on Plaintiff's left leg
 25 with Dr. Dosanj. Causation for injuries, treatment received was both reasonable and necessary,
 26 need for surgery, costs associated with the various procedures, future problems, pain and
 27 suffering of the plaintiff as observed, and related issues.

28 1.0 hours.

Trang Lehman, MD. Dr. Lehman attended Plaintiff. Causation for injuries, treatment received was both reasonable and necessary, need for surgery, costs associated with the various procedures, future problems, pain and suffering as observed, and related issues.

1.0 hours.

John L. Kronick, MD. Dr. Kronick operated on Plaintiff. Causation for injuries, treatment received was both reasonable and necessary, need for surgery, costs associated with the various procedures, future problems, pain and suffering as observed, and related issues.

1.0 hours.

Jennifer Westerman, NP. Injury causation, treatment as reasonable and necessary, need for surgery, costs associated with the various procedures, future problems, Plaintiff's observed pain and suffering, and related issues.

1.0 hours.

Elizabeth Topete, RN. Injury causation, treatment as reasonable and necessary, need for surgery, costs associated with the various procedures, future problems, Plaintiff's observed pain and suffering, and related issues.

1.0 hours.

Billing personnel at Contra Costa Regional Medical Center, and John Muir Medical Center in Contra Costa County. Costs associated with the various procedures.

30 minutes.

Dated: November 20, 2014

/s/ Russell A. Robinson
By: Russell A. Robinson
Law Office of Russell A. Robinson
Counsel for Plaintiff
BRUCE C. KYLES